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27 *Attorneys for Plaintiff and
28 Counterclaim-Defendant Moog Inc.*

29 **UNITED STATES DISTRICT COURT**
30 **CENTRAL DISTRICT OF CALIFORNIA**

31 **MOOG INC.,**

32 Plaintiff,

33 v

34 **SKYRYSE, INC., ROBERT ALIN**
35 **PILKINGTON, MISOOK KIM, and**
36 **DOES NOS. 1-50,**

37 Defendants.

38 **SKYRYSE, INC.,**

39 **CASE NO. 2:22-cv-09094-GW-MAR**

40 **DECLARATION OF KEITH
41 PIERONI IN SUPPORT OF
42 MOOG'S OBJECTION TO
43 VINCENT SOCCI**

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1 Counterclaimant,
2 v
3 MOOG INC.,
4 Counterclaim-Defendant.

Discovery Cut-Off: April 12, 2024
Pre-Trial Conference: August 12, 2024; 8:30 a.m.
Trial: August 27, 2024
Hearing: June 28, 2023
Time: 8:30 a.m.
Judge: Hon. Margo A. Rocconi
Location: Courtroom 790, 7th Floor

6 **REDACTED VERSION OF**
7 **DOCUMENT PROPOSED TO**
8 **BE FILED UNDER SEAL**

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1 I, Keith Pieroni, hereby declare and state as follows:
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3 1. I am more than 18 years old and a citizen of the United States,
4 currently residing in New York.

5 2. I am the Chief Engineer of Electronics of the Moog Aircraft Group at
6 Moog, Inc. I have been employed by Moog for over 35 years.

7 3. I have personal knowledge of the facts and opinions set forth herein.

8 4. Moog is a designer and manufacturer of electric, electro-hydraulic and
9 hydraulic motion, controls and systems for applications in aerospace, defense,
10 industrial and medical devices. Moog has developed and supplies the flight control
11 systems for some of the most common commercial aircrafts used today, and Moog
12 frequently works on sensitive government research projects in addition to its
13 commercial projects.

14 5. From 2005 to 2009, I was the Chief Engineer of Aerospace
15 Electronics. As the Chief Engineer of Aerospace Electronics, my responsibilities
16 included managing electrical design function (including digital, analog, power
17 electronics, firmware, and electronics packaging) for the Aircraft Group and the
18 Space and Defense Group.

19 6. As the Chief Engineer of Aerospace Electronics, I was in charge of
20 managing 60-180 engineers, including Moog employees and contractors.

21 7. On December 21, 2005, Moog hired Vince Soccia as a contractor to
22 work on Moog confidential projects. I understand Mr. Soccia was hired through the
23 company he founded and runs, On Target Development ("On Target").¹ Mr.
24 Soccia's employee number was [REDACTED] [REDACTED] [REDACTED]

25 8. All engineering employees at Moog are subject to strict
26 confidentiality obligations given the government and military business at Moog.
27 This includes engineering contractors, such as Mr. Soccia and On Target, who are

28 ¹ I understand Mr. Soccia has used multiple names for his business over time,
including On Target Motion and On Target Technology Development.

2 obligated as much as employees are to adhere to government statutes and
3 regulations and specific contractual requirements imposed by customers
4 (commercial and governmental) for the projects to which they are assigned. Mr.
5 Socci had a confidential relationship with Moog and Moog's customers based on
6 his contractor employment at Moog.

9. From 2006 through approximately 2007, Mr. Socci worked as an electrical engineer at Moog in the Aircraft Group on a sensitive government program called [REDACTED] [REDACTED]

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10. As part of his work for Moog, Mr. Soccia was involved in, and was
15 given, Moog confidential and proprietary information. Exhibit A to my declaration
16 is a true and correct copy of excerpts of a meeting agenda when Mr. Soccia was at
17 Moog. Exhibit A shows that Mr. Soccia was at one time presenting on [REDACTED]

20 [REDACTED] See Exhibit A. Exhibit A is marked "Moog Proprietary
21 and/or Confidential Data," and Moog considers the information presented at the
22 meeting referenced by Exhibit A to also be proprietary and confidential. *Id.*

11. While working on the [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED] [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 12. While working on firmware aspects of the [REDACTED] program, Mr.
8 Socci would have necessarily needed detailed knowledge of [REDACTED]
9 [REDACTED]
10 [REDACTED] and Mr. Socci had intimate
11 knowledge of the system's architecture. Mr. Socci also would have worked with
12 Moog's software engineers as [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 13. Attached as Exhibit B to my declaration is a true and correct copy of
16 an Excel spreadsheet detailing Mr. Socci's hours worked on two projects,
17 including the [REDACTED] program, while at Moog between 2006 to 2007. Exhibit B
18 shows that Mr. Socci worked approximately [REDACTED]
19 while at Moog. *See* Ex. B (totaling column G (actual labor hours) for all [REDACTED]
20 [REDACTED] (column L)). Mr. Socci's work on the [REDACTED] project was substantial.

21 14. Moog used the [REDACTED] program to build out other projects, such as
22 the [REDACTED] programs. For example, [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]

27 15. Mr. Socci also worked on the [REDACTED]
28 program during 2006 to 2007. Ex. A. [REDACTED] was also a Moog confidential and

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1 proprietary program. I also understand Mr. Socci worked on [REDACTED] for
2 Moog's confidential and proprietary [REDACTED] program. Exhibit C to my
3 declaration is a true and correct copy of excerpts of a Moog presentation regarding
4 the [REDACTED] program. Page 3 of Exhibit C shows that Mr. Socci was the design
5 engineer for [REDACTED]. Exhibit C includes Moog's Intellectual
6 & Proprietary Information legend. Moog considers the information in Exhibit C to
7 be confidential.

8 16. I understand that Moog has identified the [REDACTED]
9 [REDACTED] as part of the trade secrets at issue in this case. Through his work at
10 Moog, Mr. Socci therefore has personal knowledge related to issues relevant to this
11 case, including how Moog uses its trade secret and confidential information (and
12 therefore the value of Moog's proprietary information) and how Moog operated to
13 protect its trade secrets and confidential information.

14 17. Through his work at Moog, Mr. Socci also has personal knowledge of
15 Moog's confidential and proprietary information relating to [REDACTED]
16 [REDACTED] that I understand were not stolen from Moog.
17 Moreover, Mr. Socci also has personal knowledge of Moog's confidential and
18 proprietary information relating to programs not at issue in this case, such as [REDACTED]
19 [REDACTED]

20 18. To my knowledge, subject matter experts in the aviation industry
21 would not have access to Moog's confidential information regarding the [REDACTED]
22 [REDACTED] programs unless they were employed by or
23 contracting with Moog.

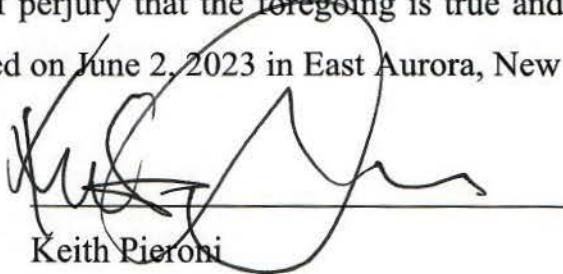
24 19. I understand from his declaration that Mr. Socci has worked for many
25 aviation companies including Saab, Sensis, Northrop Grumman, Thales, Surescan,
26 AAM, Crane Aerospace, Kearfott, and likely others that I do not have knowledge
27 of. These companies include Moog's customers, competitors, and vendors. Moog
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1 would be severely prejudiced if its confidential information was purposely or
2 accidentally transmitted outside of Moog.
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4 I declare under the penalty of perjury that the foregoing is true and correct
5 and that this declaration was executed on June 2, 2023 in East Aurora, New York.
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Keith Pieroni